

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON

SUSAN PADDEN, a single woman,  
  
Plaintiff,  
  
v.  
  
CITY OF DES MOINES, a Washington  
Municipal Corporation, and MICHAEL  
MATTHIAS,  
  
Defendants.

No. 2:20-cv-845-RSL

JOINT STIPULATED REQUEST AND  
ORDER FOR ADJUSTMENT OF  
DEADLINES FOR DISCOVERY AND  
DISPOSITIVE MOTIONS

**STIPULATION**

On January 26, 2021 the court issued an order denying Defendant's Motion to Compel without prejudice to re-file based on the current status of Plaintiff's discovery production. While the parties have continued to work cooperatively in an effort to obtain Plaintiff's discovery responses, the production has occurred on a rolling basis since Defendants' Motion to Compel was filed and Plaintiff is still continuing to produce documents and privilege logs.

As the parties jointly desire to resolve these discovery matters without requiring further court intervention, the parties hereby stipulate to and jointly request the court extend the deadline to complete discovery, for the limited purpose of discovery necessary to follow-up on Plaintiff's recent discovery productions, and to allow the parties to resolve the issue of whether Tim George's communications to certain entities are privileged, to February 23,

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KEATING, BUCKLIN & MCCORMACK, INC., P.S.  
ATTORNEYS AT LAW  
801 SECOND AVENUE, SUITE 1210  
SEATTLE, WASHINGTON 98104-1518  
PHONE: (206) 623-8861  
FAX: (206) 223-9423

2021, and the deadline to file dispositive motions to February 25, 2021. If the parties cannot agree regarding the reasonableness of any additional discovery requested by Defendants, the parties will jointly submit a request for ruling by the court in as expeditious manner as is reasonable. Pursuant to such stipulation, Defendants agree not to seek an award of attorney fees, costs, or sanctions for Plaintiff's failure to respond to discovery requests or for spoliation of evidence.

Dated this 1st day of February, 2021

/s/ Patricia Bosmans (signed per Dkt. 30)  
Patricia Bosmans, WSBA #9148  
Attorneys for Plaintiff

KEATING, BUCKLIN & McCORMACK,  
INC., P.S.

/s/ Jayne L. Freeman signed per Dkt. 30)  
Jayne L. Freeman, WSBA # 24318  
Amanda Butler, WSBA #40473  
Attorneys for Defendants

### ORDER

Pursuant to the foregoing stipulation of counsel, it is HEREBY ORDERED that the deadlines for completing discovery is extended to February 23, 2021, for the limited purpose of discovery necessary to follow-up on Plaintiff's recent discovery productions, and the deadline for filing dispositive motions is extended to February 25, 2021.

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Dated this 2<sup>nd</sup> day of February, 2021.



Robert S. Lasnik  
United States District Judge

Presented by:

KEATING, BUCKLIN & McCORMACK, INC., P.S.

/s/ Jayne L. Freeman signed per Dkt. 30)

Jayne L. Freeman, WSBA # 24318  
801 Second Avenue, Suite 1210  
Seattle, WA 98104-1518  
Telephone: (206) 623-8861  
Fax: (206) 223-9423  
Email: jfreeman@kbmlawyers.com

Law Office P. Bosmans  
1607 25th St. P. S.E.  
Puyallup, WA 98372  
PBosmans\_Law@outlook.com  
253 770-3164

/s/ Patricia Bosmans (signed per Dkt. 30)

Patricia Bosmans, WSBA #9148

Attorneys for Plaintiff

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FAX: (206) 223-9423